



**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

**UNITED STATES OF AMERICA**

**v.**

**[1] CHESTER GALLAGHER  
[2] HEATHER IDONI  
[3] CALVIN ZASTROW  
[4] COLEMAN BOYD  
[6] PAUL VAUGHN  
[7] DENNIS GREEN**

**No. 3:22-CR-00327  
JUDGE TRAUGER**

**UNOPPOSED MOTION REQUESTING PERMISSION TO FILE ADDITIONAL *IN*  
*LIMINE* MOTIONS WARRANTED BY ADDITIONAL GOVERNMENT  
DISCLOSURES IF NECESSARY**

Comes now the Defendants, Chester Gallagher, Heather Idoni, Calvin Zastrow, COLEMAN BOYD, PAUL VAUGHN and DENNIS GREEN, by and through undersigned counsel, and hereby requests permission to file additional *in limine* motions should additional unanticipated issues arise following the Government's further disclosures of discovery and Jencks materials which defense counsel anticipate prior to trial.

In support of this motion, the Defendants submit as follows:

Pursuant to this Court's scheduling order, the Defendants' *in limine* motions are due December 4, 2023 (DE 298). In anticipation of the *in limine* deadline, defense counsel and the Government have conferred about various issues. The parties have reached agreement on some issues and will file *in limine* motions addressing issues that remain in dispute by the December 4<sup>th</sup>, 2023, deadline. While discussing these issues, the Government indicated that it intends to